

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS & ASHOKA

DEFENDANTS

RESPONSE IN OPPOSITION TO MOTION TO ISSUE SUMMONS

COME NOW Defendants **Vaughn Perret** and **Charles Leary**, by and through their counsel, Purvis & Co. PLLC, and file this their Response in Opposition to the Motion for Court Authorization to Issue Summons and Complaint to Trout Point Lodge, Limited of Nova Scotia, filed April 27, 2017 [Dckt 129] and would show that the Motion is not well taken and should be denied as discussed herein as well as in their memorandum brief in support:

1. The Motion to Issue Summons is a veiled attempt for leave to file a Fourth Amended Complaint; and,
2. Those matters stated in the supporting memorandum.

RESPECTFULLY SUBMITTED, this the 8TH day of May, 2017.

VAUGHN PERRET, DEFENDANT and
CHARLES LEARY, DEFENDANT

BY: PURVIS & CO. PLLC

BY: /s/ Jason B. Purvis

Jason B. Purvis, MSB # 100873

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that, on May 8, 2017, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]

/s/ Jason B. Purvis